

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF NORTH CAROLINA**

United States of America,

Plaintiff;

v.

Terry S. Johnson, in his official capacity as  
Alamance County Sheriff,

Defendant.

No. 12-cv-1349

UNITED STATES' MOTION TO SEAL

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On April 23, 2013, this Court entered the Parties' Joint Confidentiality and Protective Order, ECF 18 ("Confidentiality Order"). Pursuant to that Order, the United States now moves this Court to file under seal two exhibits in support of its Response in Opposition to Defendant's Motion to Compel, and to accept the filing of a redacted version of the United States' Opposition to Defendant's Motion to Compel.

The documents, Exhibit B and D, are, respectively, the United States' Initial Disclosures and the United States' Response to Defendant's First Set of Interrogatories. Pursuant to the Confidentiality Order, the United States marked Exhibit D "confidential" at the time that it provided the Response to Defendant. The United States submitted Exhibit B, its Initial Disclosures, to Defendant on March 7, 2013, prior to negotiating the Confidentiality Order with Defendant. These disclosures contain personally identifiable information. As such, the United States now designates its Initial Disclosures as confidential, pursuant to the Confidentiality Order, ¶ 3(b).

In addition, the United States asks the Court to accept the filing of a redacted version of the United States' Opposition to Defendant's Motion to Compel because the Opposition cites the deposition transcript of an ACSO officer that has been designated confidential pursuant to the Confidentiality Order.

According to the procedures contained in the Confidentiality Order, *see id.* at ¶8, the United States respectfully requests that this Court file Exhibits B and D under seal.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that the foregoing United States' Motion To Seal was served through the electronic filing service on July 1, 2013, to the following individual:

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